Muszynski
Callahan
cc: Paulon (w/att)

Con Edison
Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N.Y. 10003

BY AIRBORNE EXPRESS

December 29, 1993

Matt -
you asked,
if you haven't
field inspected Astoria
maybe worthwhile
- D 1/11/94

Mr. William J. Muszynski
Regional Administrator
U. S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, N.Y. 10278

Re: 40 CFR 112.4(a) 60-Day Oil Spill Report
Astoria Generating Station

Dear Mr. Muszynski:

Pursuant to 40 CFR Part 112.4(a) the Consolidated Edison Company of New York, Inc. (Con Edison) submits herewith a "60-Day Report" on two oil spill events that occurred with a 12 month period at Con Edison's Astoria Generating Station in Queens, New York.

The enclosed "60-Day Report" contains the information requirements of 40 CFR 112(a). As required, also enclosed is a copy of the facility SPCC Plan.

Should there be any questions, please contact me at (212) 460-4833.

Very truly yours,

Robert T. Keegan, Ph.D.
Director
Water and Waste Management
Environmental Affairs

RECEIVED
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REMOVAL AND PREPAREDNESS BRANCH

Vdp/vi
Enclosure

cc: Richard Newman, P.E. (w/o SPCC Plan)
Water Quality Engineer
New York State Department of
Environmental Conservation
Region 2 Office
47-40 21st Street, Long Island City, N.Y. 11101

Consolidated Edison Company of New York, Inc.
Water and Waste Management
Environmental Affairs

40 CFR 112.4(a)
60-Day Oil Spill Report
Astoria Generating Station

1.	**Name of Facility**	Astoria Generating Station
2.	**Name of Owner**	Consolidated Edison Company of New York, Inc. (Con Edison)
3.	**Location of Facility**	21st Street and 20th Avenue Astoria, New York 11105
4.	**Initial Facility Operation**	The Astoria site dates to the turn of the century. The existing Generating Station was built in 1953.
5.	(a) **Maximum Oil Storage Capacity**	13,575,000 gallons (No. 6 oil)
	(b) **Normal Daily Throughput**	953 barrels (No. 6 oil) (based on 1991 data)
6.	**Facility Description**	The Astoria Generating Station incorporates: • Astoria Generating Unit Nos. 1 to 5, • an emergency gas turbine (uses natural gas as fuel), and • the Astoria Fuel Oil Terminal and Tank Farm.

Units No. 1 to 5 can use either natural gas or No. 6 oil.

The major components of the Astoria Generating Station fuel oil facilities are:

- the fuel oil barge unloading facility,
- the Astoria fuel oil storage tanks and the fuel oil intertank transfer facilities,
- the Castle/Astoria fuel oil supply line, and
- the fuel oil transfer facility to the Ravenswood Generating Station.

The No. 6 fuel oil used by the Astoria Generating Station is supplied to the site by vessel and pipeline. The fuel oil vessel unloading facility is located in the northeast corner of the site.

Astoria Generating Station has seven active No. 6 oil storage tanks having a total capacity of just over 13.5 million gallons. Four tanks are underground/mounted tanks and three are aboveground tanks.

7. **Attached SPCC Plan**

A copy of the Astoria Generating Station SPCC Plan, dated December, 1993, is attached.

8. **Cause of Spills**

A. September 21, 1993 Incident

On September 21, 1993, an oil sheen was observed discharging into the East River from a 36-inch diameter storm sewer. No apparent source of the oil could be found. Laboratory analysis identified the oil as a mixture of transformer and cable oil. (This is the same storm sewer from which oil discharges were reported on March 19 and June 25, 1992.)

B. November 3, 1993 Incident

On November 3, 1993, an oil sheen was observed discharging into the East River from the Condenser Discharge Tunnel at the Astoria Generating Station. The source of the leak was a tube failure on the 30 West Main Oil Cooler, which leaked approximately 100 gallons of turbine oil.

9. **Corrective Actions Taken**

A. September 21, 1993 Incident

Upon discovery of the spill, booms were deployed at the storm sewer outfall and absorbent booms were placed in several storm sewer catch basins. The storm sewer was cleaned to remove the oil deposit residues.

B. November 3, 1993 Incident

Oil was contained by booms. Clean-up was performed by an oil spill clean-up contractor.

10. **Preventive Measures**

A. September 21, 1993 Incident

To address this recurring problem, Con Edison has retained a contractor Ebasco Engineering to accurately locate the storm sewer system; to identify inlets, pipe sizes, and potential oil and dry weather inflow sources; to characterize oil sources and types; and, to conceptualize the measures which would be necessary to effectively remediate the source(s) of the existing dry weather flows and oil in the storm sewer at the Astoria site. All actions are being coordinated with DEC. The preliminary schedule calls for Ebasco to complete its report by April, 1994. In the interim, Con Edison continues to maintain absorbent booms within the sewer system and at the sewer outfall.

B. November 3, 1993 Incident

The tube which failed has been plugged at both ends and taken out of service.

VIA EMAIL AND CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

November 27, 2017

Ms. Kelli Lucarino
U.S. Environmental Protection Agency
Region 2
2890 Woodbridge Avenue MS-211
Edison, New Jersey 08837-3679
Email: lucarino.kelli@epa.gov

Re: Evaluation of Con Edison's SPCC Plans and Implementation
EPA Oil ID: R2-NY-01201 & R2-NY-01202

Dear Ms. Lucarino:

On behalf of Consolidated Edison Company of New York, Inc. (Con Edison), we write to thank EPA for its review of the Spill Prevention Control and Countermeasure (SPCC) Plans for Con Edison's Dielectric Fluid-Fuel Cable System (Cable Plan) and Substation Operations (Substation Plan) and for the evaluation performed of our implementation of these plans at Con Edison's Bay Street Cooling Plant and its Gowanus Substation. As requested by EPA in its August 29, 2017 letter to Brian Brush, this letter sets forth the SPCC Plan revisions that Con Edison intends to make in response to the specific comments received from EPA.

Cable Plan

EPA Item 1. *Plan does not follow the sequence of 40 § 112.7, or, alternatively, does not have a section with a cross-reference to the location of requirements in 40 CFR § 112.7. The SPCC Plan did not follow the sequence of the SPCC Rule. When a SPCC Plan does not follow the sequence of the SPCC Rule, a sufficient cross-reference must be provided to identify the location of all applicable SPCC provisions in the SPCC Plan.*

Con Edison Response. Con Edison intends to update the Cable Plan to include, as a separate section, a cross-reference table identifying the location of all applicable SPCC requirements outlined in 40 CFR § 112.7.

EPA Item 2. *Plan does not describe the physical layout of the facility and include a facility diagram which marks the location and contents of each container [40 CFR*

§112.7(a)(3)]. The Plan does not describe the physical layout of each of the ten stand-alone PURS/cooling plants covered by the Plan as mentioned in Section 2.

Con Edison Response. Con Edison intends to update Appendix A-2g of the Cable Plan to include facility diagrams showing the location and contents of each of the 10 stand-alone Public Utility Regulating Station (PURS) and the five PURS situated within the substations.

EPA Item 3. *Plan does not describe discharge prevention measures including procedures for routine handling of products [40 CFR § 112.7(a)(3)(ii)]. Section 9 of the Plan describes measures for tank truck loading and unloading procedures which do not appear applicable to the Plan. Additionally, measures for routine handling of products are not discussed. Discharge prevention measures, including procedures for routine handling of products, are not discussed for the ten stand-alone PURS/cooling plants covered by the Plan.*

Con Edison Response. Section 9 of the Cable Plan describes measures relating to the potential for spills during loading and unloading operations, including containment in those areas, measures to ensure trucks do not depart before loading operations are completed, and inspections of tanker trucks prior to departure. These procedures are applicable to the Cable Plan because loading and unloading of oil occurs at pressurizing plants within the cable system. Con Edison intends to modify Sections 3.2 and 13 of the Cable Plan to separately describe discharge prevention measures that are applicable for PURS. Con Edison does not plan to include procedures for the routine handling of products as part of these revisions, because no loading or unloading of product occurs at PURS.

EPA Item 4. *Plan does not describe discharge or drainage controls such as secondary containment, equipment, and procedures for control of a discharge [40 CFR §112.7(a)(3)(iii)]. Table 5-l describes discharge and drainage controls and procedures for control of a discharge for all elements of the transmission line system with the exception of the transmission lines involved in water crossings.*

Con Edison Response: Table 5-1 of the Cable Plan includes the discharge and drainage controls and procedures for cable water crossings under the heading "Underground portion of cable system." Several of the measures described are applicable to cable water crossings, including the deployment of containment booms as an active discharge control measure and the use of passive secondary containment through encasement of the cables in concrete, the installation of feeders in a tunnel, and the installation of stop joints. To make this clear, we intend to revise Table 5-1 to separately categorize those containment measures involving water crossings under a new heading: "Transmission lines involved in water crossings."

EPA Item 5. *Plan does not describe countermeasures for discharge discovery, response and clean-up [40 CFR §l l2.7(a)(3)(iv)]. The Plan does not include a section dedicated to discussing the requirements of 40 CFR §ll2.7(a)(3)(iv). Discharge detection methods, however, are discussed in Section 5.2 for the feeder lines. Section 5.2 indicates that leak detection systems are installed on 17 of 268 feeder lines. Leak detection systems, or other methods to discover discharges, are not discussed for all 268*

feeder lines. Additionally, the SPCC Plan does not discuss countermeasures for the ten stand-alone PURS/cooling plants covered by the Plan other than mentioning spill carts are located at each PURS unit in Section 13 of the Plan.

Con Edison Response: The Cable Plan discusses the requirements of 40 CFR §ll2.7(a)(3)(iv) in Sections 10 and 13. Sections 5.2 and 5.2.2 of the Cable Plan discuss leak detection systems for the entire cable system, including the feeder lines. Countermeasures are discussed in Section 5.1 and in Table 5-1 for all relevant equipment, including the ten stand-alone PURS. Fully stocked spill carts are an accepted means of secondary containment (see 40 CFR §l l2.7(c)(1)(viii), "Sorbent materials.") and are used at all of these facilities. In response to EPA's evaluation, we intend to provide more detailed descriptions of the cable leak detection systems along with a new Table 5-2 that lists the leak detection system being utilized for each cable.

EPA Item 6. *Plan does not describe a contact list and phone numbers for the facility response coordinator, National Response Center, clean-up contractors and appropriate Federal, State and local agencies who must be contacted in event of a discharge [40 CFR §l l2.7(a)(3)(vi)]. The Plan does not include contact information for the National Response Center, clean-up contractors, or the EPA.*

Con Edison Response: Section 13.1.1 of the Cable Plan references the internal company spill reporting procedure and provides the number for the EH&S control desk. As stated in the plan, the EH&S control desk is staffed 24 hours a day and is responsible for all internal and external spill notifications. Further, Section 13.1.1 states that "all external contacts requiring notification in the event of a dielectric fluid spill emergency are provided in Appendix F," which includes the National Response Center, the cleanup contractors, and their contact numbers.

We are concerned that adding the names and numbers of the NRC and others to the body of the plan would confuse users of the plan; result in improper or incomplete notification being provided to the appropriate federal, state and local agencies; and potentially delay on-the-ground response activities. For these reasons, Con Edison is not proposing any revisions to the Cable Plan in response to this item. We welcome the opportunity to discuss this issue further if EPA would find that helpful.

EPA Item 7. *Plan does not designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management [40 CFR §112.7(f)(2)]. Section 12 of the Plan, which addresses 40 CFR §112.7(f), does not discuss who is accountable for discharge prevention, and who reports to facility management.*

Con Edison Response: In Section 2 of the Cable Plan, under "Designated person(s) accountable for oil spill prevention at facility," a table of relevant departments and the associated Titles of Responsible Individuals is presented. Section 12 of submitted Plan describes how personnel are designated and trained in discharge prevention roles. In the Cable Plan, a letter signed by Tracy Cureton, General Manager, confirms that he is responsible to commit resources necessary to implement the plan. We intend to add to

Section 12.1 the name of a person who is accountable for discharge prevention and who reports to facility management.

Gowanus Substation Plan

EPA Item 1. *Plan does not follow the sequence of 40 CFR §112.7, or, alternatively, does not have a section with a cross-reference to the location of requirements in 40 CFR §112.7. [40 CFR §112.7]*

Plan does not describe methods of disposal for recovered materials. [40 CFR §112.7(a)(3)(v)]. Section 12 of the Plan discusses notification procedures and states release reporting procedures shall be followed per CEHSP E 1001 which contains a checklist of information that must be obtained from the spill incident site. This document, however, is not provided in the Plan.

Con Edison Response. As with the Cable Plan, Con Edison intends to update the Substation Plan to include, as a separate section, a cross-reference table identifying the location of all applicable SPCC requirements outlined in 40 CFR §112.7. The Substation Plan describes the methods of disposal for recovered materials at Section 13.2.2. As stated in that plan, these methods include the use of bladders, temporary containment structures, drums, or tanker trucks. In response to EPA's request, Section 12 of the Substation Plan will be updated to include a copy of the referenced spill reporting checklist.

EPA Item 2. *Plan does not organize procedures for responding to a discharge in a way that makes them readily usable, including appropriate supporting material. [40 CFR §1 12.7(a)(5)]. Section 12 of the Plan states the Oil Spill Contingency Plan (OSCP) for Con Edison Electrical Substations will be utilized by Con Edison personnel to respond to spills. This document is not provided in the Plan.*

Con Edison Response. We intend to clarify Section 12 of the Substation Plan to make clear that Con Edison provides appropriate secondary containment and diversionary structures to prevent a discharge to waterways, and that as an additional measure to protect the waterways in the event of a discharge, an off-site spill response plan has also been developed.

EPA Item 3. *Plan does not include a prediction of the direction, rate of flow, and total quantity of potential oil spills. [40 CFR §112.7(b)] Table 3 discusses typical failure modes, release quantities, discharge rates and containment methods for typical scenarios, however the discussion does not include the flow paths to waterways.*

Con Edison Response: The Substation Plan includes predictions of discharge direction, flow rate and quantity for each type of major equipment failure. Table 3 in Attachment A of the Substation Plan shows major failure type, total quantity, rate, and direction of flow as required by the regulation. In an effort to enhance the Substation Plan, we intend to add a new column to Table 3 of the Substation Plan to identify the downstream waterway.

EPA Item 4. *Plan does not state that appropriate containment is sufficiently impervious to spilled oil. [40 CFR §1 12.7(c)]. Appendix A, page A-9 states "In the event of a spill*

from any of these units, (transformer T2 and L&P transformers) oil would discharge onto the adjacent crushed stone and soil surfaces and percolate to an unspecified depth." This seems to indicate the secondary containment for this area is not sufficiently impervious.

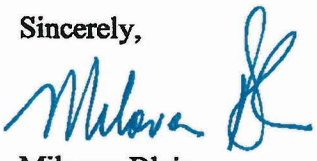
Con Edison Response: We intend to revise the plan to explain how existing passive containment measures are sufficiently impervious to address the quantity of oil that would most likely be discharged from the oil-filled operational equipment at the facility before cleanup occurs. In the event of a larger, non-typical discharge, Con Edison relies on active onsite measures and the off-site facility response plan.

* * *

Con Edison appreciates your evaluation of the contents and implementation of these SPCC Plans. EPA's input has helped Con Edison improve the overall quality of these plans. We intend to complete the plan revisions described above by December 31, 2017.

Should you have any questions or require additional information regarding the plan revisions, please contact me or Brian Brush at (212) 460-6950.

Sincerely,



Milovan Blair
Senior Vice President, Con Edison

cc: Mr. Christopher Jimenez, US EPA Region 2

CERTIFIED MAIL # P 581 813 627
RETURN RECEIPT REQUESTED

MAR 1 8 1998

Mr. Harry Coates
Consolidated Edison Company of New York
4 Irving Place
New York, New York 10003

Dear Mr. Coates

This letter references a Spill Prevention Control and Countermeasures (SPCC) Plan Review performed by the U.S. Environmental Protection Agency (EPA) on, March 17, 1998 for the Consolidated Edison, Sprain Brook Transmission Substation facility in Yonkers, New York. A copy of your SPCC Plan dated December 26, 1998 was received in our office in January of 1998. This report outlines violations of 40 CFR Part 112, U.S. Environmental Protection Agency (EPA) regulations pertaining to the prevention of oil spills from reaching waters of the United States.

I reviewed the revised SPCC plan. All SPCC regulations were addressed adequately and all plan violations were corrected, with the following exceptions:

1. Plan does not have wording that secondary containment or diversionary structures are "sufficiently impervious", and does not describe how these structures are sufficiently impervious. [40 CFR §112.7(c)(1)(i) & (e)(2)(ii)]

2. Plan does not indicate that tanks D01, and D02 have either secondary containment that can hold the contents of the single largest tank plus sufficient freeboard to allow for precipitation, or a drainage system that could divert a spill to a catchment basin. [40 CFR §112.7(e)(2)(ii)]

3. The Plan states on page 6-1 that underground metallic storage tanks are pressure tested on a regular basis, that the facility does not have any partially buried storage tanks, and that existing underground storage tanks and associated piping **if any** are described in table two. It does not describe a system for corrosion protection. SPCC Plans are supposed to be site specific, "shall follow the sequence out lined in 112.7" and "include a discussion of the facility's conformance with the appropriate guidelines". Including the statement **if any** in this section in the plan seems to indicate that this narrative is not site specific to the Sprain Brook substation. [40 CFR §112.7(e)(2)(iv)]

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4. The Plans discussion of aboveground tank testing methods, states the facility's aboveground storage tanks **if any** are visually examined on a regular basis. The statement **if any** indicates that the narrative for this section is not site specific. Additionally, the narrative states that Con Edison performs monthly inspections per CSD Procedure 0700-58, but does not explain what this procedure entails or indicate if the procedure is included in the plan. [40 CFR §112.7(e)(2)(vi)]

5. Plan does not discuss the fail-safe engineering method used to avoid overfilling aboveground bulk storage tanks. The Plan's narrative only discusses below ground storage tanks. [40 CFR §112.7(e)(2)(viii)]

6. The SPCC Plan states "there are **essentially** no transfer operations at the facility other than drum transfers described in Section 5.3 and tank truck unloading and loading described in Section 9.0 so this guideline does not apply at area/transmission substations". It should be noted Section 5.3 of the SPCC Plan does not describe drum filling operations, and Section 9 of the Plan does not describe tank truck loading unloading operations. Use of the phrase term "essentially no transfer operations" indicates that this section of the SPCC Plan is not specific to the Sprain Brook substation [40 CFR §112.7(e)(3)]

7. Plan does not indicate that drainage of the loading/unloading area either flows into a catchment basin or a treatment facility designed to handle spills; or, flows into a containment system designed to hold at least the maximum capacity of any single compartment of any tank car or truck loaded or unloaded at the facility. [40 CFR §112.7(e)(4)(ii) & (e)(1)(iii-iv)]

8. Plan does not indicate that an interlocked warning light or physical barrier system or warning signs are provided to prevent vehicular departure before disconnect of the transfer lines. [40 CFR §112.7(e)(4)(iii)]

9. Plan does not state that valves which permit the outward flow of a tank's contents to the surface are locked closed when in non-operating or non-standby status. [40 CFR §112.7(e)(9)(ii)]

10. Plan does not state that the starter controls on all oil pumps are locked in the "off" position, or only accessible to authorized personnel when in non-operating or non-standby status. [40 CFR §112.7(e)(9)(iii)]

11. Plan does not state that loading/unloading connections of pipelines are securely capped or blank-flanged when not in service or standby service for an extended time. [40 CFR §112.7(e)(9)(iv)]

Note: Comments 9, 10, 11, are indicated in the Plan's cross-reference as not applying to the Sprain Brook Substation, but since the facility does have oil storage tanks and loading/unloading operations, the Plan should discuss why these sections of the regulation do not apply to the facility.

If there are any questions concerning SPCC compliance issues, please contact me at (732) 906-6847. Please send all correspondence to the following address:

Christopher Jimenez
U.S. Environmental Protection Agency
Regional Office II
2890 Woodbridge Avenue MS-211
Edison, New Jersey 08837-3679

Sincerely yours,

Christopher Jimenez, SPCC Coordinator
Oil Program Team
Response and Prevention Branch

VIA EMAIL AND CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

November 27, 2017

Ms. Kelli Lucarino
U.S. Environmental Protection Agency
Region 2
2890 Woodbridge Avenue MS-211
Edison, New Jersey 08837-3679
Email: lucarino.kelli@epa.gov

Re: Evaluation of Con Edison's SPCC Plans and Implementation
EPA Oil ID: R2-NY-01201 & R2-NY-01202

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Con Edison Response. Con Edison intends to update the Cable Plan to include, as a separate section, a cross-reference table identifying the location of all applicable SPCC requirements outlined in 40 CFR § 112.7.

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We are concerned that adding the names and numbers of the NRC and others to the body of the plan would confuse users of the plan; result in improper or incomplete notification being provided to the appropriate federal, state and local agencies; and potentially delay on-the-ground response activities. For these reasons, Con Edison is not proposing any revisions to the Cable Plan in response to this item. We welcome the opportunity to discuss this issue further if EPA would find that helpful.

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Con Edison Response: In Section 2 of the Cable Plan, under "Designated person(s) accountable for oil spill prevention at facility," a table of relevant departments and the associated Titles of Responsible Individuals is presented. Section 12 of submitted Plan describes how personnel are designated and trained in discharge prevention roles. In the Cable Plan, a letter signed by Tracy Cureton, General Manager, confirms that he is responsible to commit resources necessary to implement the plan. We intend to add to

Section 12.1 the name of a person who is accountable for discharge prevention and who reports to facility management.

Gowanus Substation Plan

EPA Item 1. *Plan does not follow the sequence of 40 CFR §112.7, or, alternatively, does not have a section with a cross-reference to the location of requirements in 40 CFR §112.7. [40 CFR §112.7]*

Plan does not describe methods of disposal for recovered materials. [40 CFR §112.7(a)(3)(v)]. Section 12 of the Plan discusses notification procedures and states release reporting procedures shall be followed per CEHSP E 10.01 which contains a checklist of information that must be obtained from the spill incident site. This document, however, is not provided in the Plan.

Con Edison Response. As with the Cable Plan, Con Edison intends to update the Substation Plan to include, as a separate section, a cross-reference table identifying the location of all applicable SPCC requirements outlined in 40 CFR §112.7. The Substation Plan describes the methods of disposal for recovered materials at Section 13.2.2. As stated in that plan, these methods include the use of bladders, temporary containment structures, drums, or tanker trucks. In response to EPA's request, Section 12 of the Substation Plan will be updated to include a copy of the referenced spill reporting checklist.

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Con Edison Response: The Substation Plan includes predictions of discharge direction, flow rate and quantity for each type of major equipment failure. Table 3 in Attachment A of the Substation Plan shows major failure type, total quantity, rate, and direction of flow as required by the regulation. In an effort to enhance the Substation Plan, we intend to add a new column to Table 3 of the Substation Plan to identify the downstream waterway.

EPA Item 4. *Plan does not state that appropriate containment is sufficiently impervious to spilled oil. [40 CFR §1 12.7(c)]. Appendix A, page A-9 states "In the event of a spill*

from any of these units, (transformer T2 and L&P transformers) oil would discharge onto the adjacent crushed stone and soil surfaces and percolate to an unspecified depth." This seems to indicate the secondary containment for this area is not sufficiently impervious.

Con Edison Response: We intend to revise the plan to explain how existing passive containment measures are sufficiently impervious to address the quantity of oil that would most likely be discharged from the oil-filled operational equipment at the facility before cleanup occurs. In the event of a larger, non-typical discharge, Con Edison relies on active onsite measures and the off-site facility response plan.

* * *

Con Edison appreciates your evaluation of the contents and implementation of these SPCC Plans. EPA's input has helped Con Edison improve the overall quality of these plans. We intend to complete the plan revisions described above by December 31, 2017.

Should you have any questions or require additional information regarding the plan revisions, please contact me or Brian Brush at (212) 460-6950.

Sincerely,

Milovan Blair
Senior Vice President, Con Edison

cc: Mr. Christopher Jimenez, US EPA Region 2

PSE&G

Public Service Electric and Gas Company Duffield and Van Keuren Avenues Jersey City, New Jersey 07306-6189

Michael F. Solecki
USEPA - Region 2
2890 Woodbridge Avenue
Edison, NJ 08837-3679

Certified RETURN/RECEIPT: Z 270 750 271

RE: Storage quantity of oil at PSE & G - Hudson Generating Station

Dear Mr. Solecki:

The following information was requested during your site visit on 3/24/97, at which time you requested clarification with regard to the oil storage quantity at Hudson Generating Station. Oil storage includes the following: oil, dielectric fluid, gasoline, kerosene, distillate fuel, No. 6 fuel oil, diesel, and lubricating oils.

Due to the replacement of the No. 1 Storage Tank (No. 6 oil) floor and associated work, the storage volume for the facility has changed. This change in storage quantity for the tank was calculated and certified by Saybolt Inc., which conducted the testing of the tank and issued the new tank capacity charts.

ON-SITE OIL STORAGE CAPACITY

Original Site Quantity	-	11,827,580 Gallons
New Site Quantity	-	11,695,219 Gallons

Should you have any question regarding this or any other matter, I may be contacted at (201) 217-3672.

Very truly yours,

James H. Peach
Senior Environmental Engineer

a:epa-sto.doc

PSE&G

Public Service Electric and Gas Company Duffield and Van Keuren Avenues Jersey City, New Jersey 07306-6189

March 13, 1997

Jenox

CERTIFIED MAIL # P 341 792 044
RETURN RECEIPT REQUESTED

Ms. Jeanne M. Fox
Regional Administrator - Region II
United States Environmental Protection Agency
290 Broadway
New York, New York 10007

RE: Discharge Report Pursuant to 40 C.F.R.112.4(a)
Public Service Electric and Gas Company
Hudson Generating Station
Jersey City, New Jersey 07306

Dear Ms. Fox:

Pursuant to 40 C.F.R. 112.4(a), Public Service Electric and Gas Company ("PSE&G ") hereby submits this report of an incident that occurred at PSE&G 's Hudson Generating Station ("Hudson ") on January 17, 1997. The incident in question involved the release of approximately 23,009 gallons of electrical insulating oil (highly refined light mineral oil) from a high voltage power transformer into a large secondary containment area.

This incident previously has been reported to the New Jersey Department of Environmental Protection ("NJDEP ") pursuant to and in accordance with applicable state regulations. A copy of PSE&G 's report to the NJDEP is attached for your reference. The remainder of this report is intended to satisfy the reporting requirements of 40 C.F.R. Part 112.4(a).

1. Name of the facility:

PSE&G - Hudson Generating Station

2. Name of the owner and operator of the facility:

Public Service Electric and Gas Company
80 Park Plaza
Newark, New Jersey 07101
(201) 430-7000

OPM/PPEB
97 MAR 19 PM 12:51
US EPA

3. Location of the facility

Duffield and Van Keuren Avenues
Jersey City, New Jersey 07306

4. Date and year of initial facility operation:

December 10, 1964

5. Maximum storage or handling capacity of the facility and normal daily throughput:

The total storage capacity of the tanks and vessels at the facility is listed below; however, the discharge reported herein did not result from the on-site storage tanks or vessels:

Aboveground Storage Capacity (approximate)	11,683,000 gallons
Underground Storage Capacity	2,000 gallons
Total Storage Capacity (approximate)	11,685,000 gallons

6. Description of the facility, including maps, flow diagrams, and topographical maps.

Hudson Generating Station occupies approximately 240 acres on the east bank of the Hackensack River in Jersey City, Hudson County, New Jersey. Hudson is located about 3 river miles upstream from the confluence of the Hackensack River with Newark Bay. The Hackensack River is tidal in the vicinity of the station.

Hudson produces electric power for the citizens of New Jersey and neighboring states. Hudson is capable of producing 1115 megawatts of electricity by utilizing two steam turbine-generators (Units 1 & 2) and one combustion turbine generator (Unit 3). Steam for Unit 1 is produced in a once-through boiler utilizing No. 6 fuel oil or natural gas. Unit 2 also is operated by a once-through boiler; however, it can utilize low sulfur coal in addition to No. 6 fuel oil or natural gas. Unit 3 uses jet engines as the primary mover and burns kerosene.

A Locus Map showing the site location and a general site plan, reflecting the current facility conditions, is attached. The flow diagrams and topographical maps are included in the SPCC Plan for the facility, which is on file at EPA Region II.

7. A complete copy of the SPCC Plan with amendments:

A SPCC field inspection was performed by EPA Region II on July 5, 1996, and Hudson 's SPCC plan subsequently was approved on July 12, 1996. PSE&G is therefore not submitting a copy of the SPCC Plan herewith.

8. The cause(s) of such spill, including a failure analysis of system or sub-system in which the failure occurred:

The release occurred due to a rupture of the transformer reservoir. An initial root cause anaysis indicated the rupture was the result of an internal high voltage bushing failure. The exact cause for the bushing failure is still under investigation.

9. Corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements:

Emergency response activities were initiated immediately. Clean Harbors, Inc. and All-Chem, Inc. were engaged to assist in the clean-up efforts. All free-standing oil in the secondary containment area initially was pumped into a tanker and then later transferred to a holding tank.

The damaged transformer has been taken out of service and removed. A spare transformer unit will be placed in service for approximately 6 months while the damaged transformer is rebuilt and appropriate tests are performed to verify the integrity of the unit.

A procedure has been developed for the removal of the crushed stone and other oil-contaminated materials from the containment area, and the installation of an impermeable liner meeting the standards outlined at N.J.A.C. 7:1E-2.6. These activities will complete the the site remediation; however, the matter will remain open until a final approval is received from the NJDEP.

10. **Additional preventative measures taken or contemplated to minimize the possibility of recurrence:**

To minimize the possibility of recurrence, a new impermeable liner meeting the standards outlined at N.J.A.C.7:1E-2.6 will be installed in the secondary containment area. In addition, and as discussed previously, the damaged transformer is being rebuilt and tested to ensure that unit's integrity prior to being placed back into service.

11. **Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event:**

A copy of the February 13, 1997 Discharge Confirmation Letter submitted by PSE&G to the NJDEP is attached.

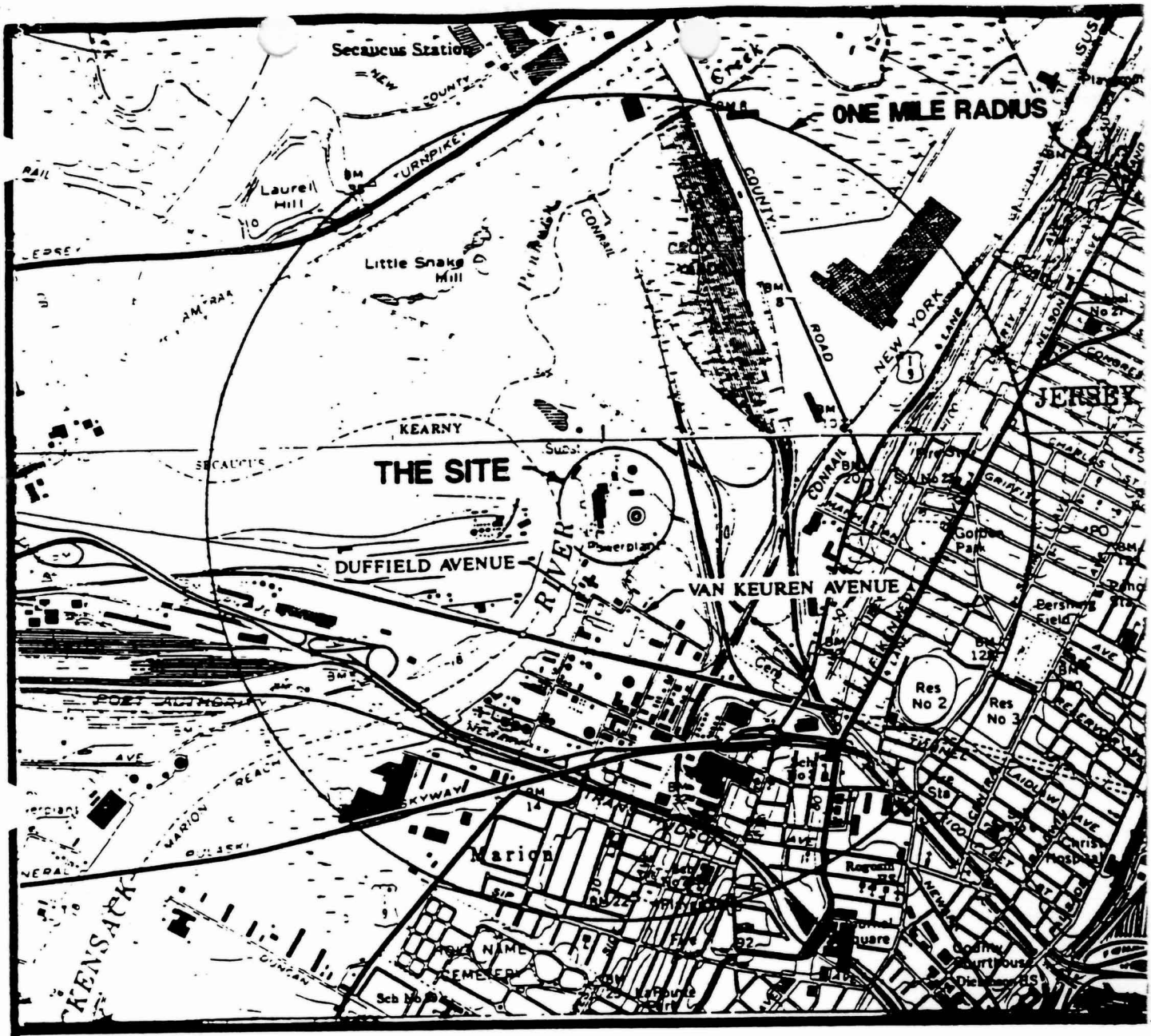
If you have any questions regarding the information contained in this letter, or desire further information about the incident, please contact Mr. James H. Peach, Senior Environmental Engineer - Hudson Generating Station, at (201) 217-3672.

Very truly yours,

John J. Donleavy
Manager
Hudson Generating Station

Attachments

c: NJDEP, Bureau of Discharge Prevention



SCALE 1:24 000

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL

NEW JERSEY

QUADRANGLE LOCATION

N

COORDINATES					
UTM: 4,511,000mN, 578,200mE LONGITUDE : 74° 04' 25" W LATITUDE : 40° 44' 50" N	A	PRELIMINARY	M. M. C.	J.R.S.	J.R.S.
	ISSUE	DESCRIPTION	DRWN.	CHKD.	APP'D

BASE MAP: UNITED STATES GEOLOGICAL SURVEY (USGS) JERSEY CITY, N.J. – N.Y. QUADRANGLE

CleanHarbors
ENVIRONMENTAL ENGINEERING, INC.
325 Wood Road
Braintree, Massachusetts 02184
Telephone (617) 849-1200/1800

PUBLIC SERVICE ELECTRIC & GAS COMP
HUDSON GENERATING STATION
DUFFIELD AND VAN KEUREN AVENUES
JERSEY CITY, NEW JERSEY 07306

LOCUS MAP

PROJECT NO. E-2599	DWG. NO. 2599-L-04	FIGUR
SCALE AS NOTED		

PSE&G

Public Service Electric and Gas Company Duffield and Van Keuren Avenues Jersey City, New Jersey 07306-6189

Hudson Generating Station
February 13, 1997

CERTIFIED MAIL P 341 792 036
RECEIPT REQUESTED

Bureau of Discharge Prevention
New Jersey Department of Environmental Protection
401 East State Street
CN-424
Trenton, New Jersey 08625--0424

Re: Discharge Confirmation Report
NJDEP Case No. 97-1-17-1439-09

Dear Sir/Madam:

The attached confirmation report is being filed pursuant to and in satisfaction of the requirements of N.J.A.C. 7:1E-5.8(c) with respect to a discharge which occurred at Public Service Electric and Gas Company's ("PSE&G") Hudson Generation Station. This discharge event was assigned NJDEP Case No. 97-1-17-1439-09.

If you have any questions, please contact Mr. James H. Peach, Senior Environmental Engineer, at (201) 217-3672.

Very truly yours

John J. Donleavy
Manager - Hudson Generating Station

Attachments (2)

DISCHARGE CONFIRMATION REPORT
HUDSON GENERATING STATION
NJDEP CASE NO. 97-1-17-1439-09

1. **Name, Address and Telephone Number of Individual Who Reported**

Mr. James H. Peach
Senior Environmental Engineer
Hudson Generating Station
Duffield & Van Keuren Avenues
Jersey City, New Jersey 07306
(201) 217-3672

2. **Name, Address and Telephone Number of Person Submitting Report**

John J. Donleavy
Manager
Hudson Generating Station
Duffield & Van Keuren Aves.
Jersey City, N.J. 07306
(201) 217-3620

3. **Name, Address and Telephone Number of Owner/Operator of Facility Where Discharge Occurred.**

Owner

Public Service Electric and Gas Company
80 Park Plaza
Newark, New Jersey 07101-0570

Attn: Mr. Patrick Colgan
Vice President - Fossil Generation
(201) 430-8675

Operator

Mr. John J. Donleavy
Manager
Hudson Generating Station
Duffield & Van Keuren Ave.
Jersey City, New Jersey 07306

4. **Source of Discharge, If Known**

345-1 Sub-station transformer

5. **Location of Discharge**

Name:	Hudson Generating Station
Street Address:	Duffield and Van Keuren Ave.
Lot & Block:	lots 4A & 4C - block 673 lots 6A, F, 8C, 9, 10C & 10D - block 681 lots 1B, 2, 3A, 3B, 4A, 4D, 23B, & 24-31 - block 1200
Municipality:	Jersey City
County:	Hudson
EPA ID #:	NJD094961042
Site Map:	See Attachment A

6. **Common Name and CAS No. of Hazardous Substance Discharged**

Electrical Insulating Oil - Highly refined light mineral oil.
CAS No. - Complex Mixture (not applicable)

7. **Quantity of Hazardous Substances Discharged**

Approximately 23,009 gallons of transformer oil spilled into the containment area.

8. **Date and Time Discharge Began, Was Discovered, Ended and Was Reported**

Began:	January 17, 1997 1340 hours
Discovered:	January 17, 1997 1400 hours approximately
Ended:	January 17, 1997 1600 hours approximately
Reported:	January 17, 1997 1439 hours

9. **Detailed Description of Containment, Cleanup and Removal Measures, Summary of Costs Incurred and Proof of Disposal**

Description of Measures Taken:

Clean Harbors Inc. was called to work on the immediate containment and clean up of the discharge at Hudson Generating Station. The oil in the containment was pumped from the sump well into a tanker and than transfered to a holding tank. The stone in the containment area will also be treated.
All Chem, Inc. was also called in by PSE&G's Transmission & Distribution Department to assist in the clean-up.

Summary of Costs:

An actual summary of cost is not yet available. A cost summary will be available at this location when all charges and costs are determined.
Manifests or bills of lading will be kept at this location and copies are avialable upon request.

10. Corrective or Preventive Measures Taken or Proposed

The transformer will be repaired, tested and placed back into service. No further preventative measures are required since this discharge was due to a catastrophic failure of the transformer. In addition, to minimize the possiblilty of recurrence, a new impermeable liner will be installed which meets the standards outlined at N.J.A.C 7:1E-2.6.

11. Name, Address and Telephone Number of Cleanup Entities

Public Service Electric and Gas Company
Duffield and Van Keuren Aves.,
Jersey City, N.J. 07306
(201) 217-3624

Clean Harbors Inc.
3 Sutton Place
Edison, NJ 08817 (908) 248 - 1997

All Chem, Inc.
P.O. Box 206
Keansby, N. J. 08832

Other vendors may be employed to assist PSE&G with the containment cleanup.

12. Description of Sample Date, Type, Quantity and Location

Testing will (if required) be done in accordance with all applicable State and Federal requirements. All testing data records will be kept on site and copies will be available upon request.

13. Certification of Financial Responsibility

PSE&G has demonstrated financial responsibility pursuant to N.J.A.C. 7:1E-4.3(a)10 and submitted proof there of to the Departmentas required by N.J.A.C. 7:1E-4.4. This demonstration of financial responsibility is in full force and effect. A copy of the Certification of Financial Responsibilities is attached hereto, Attachment B.

14. Supplemental Information

N/A

15. Any Additional Information

N/A

16. Certification Pursuant to N.J.A.C. 7:1E-4.11

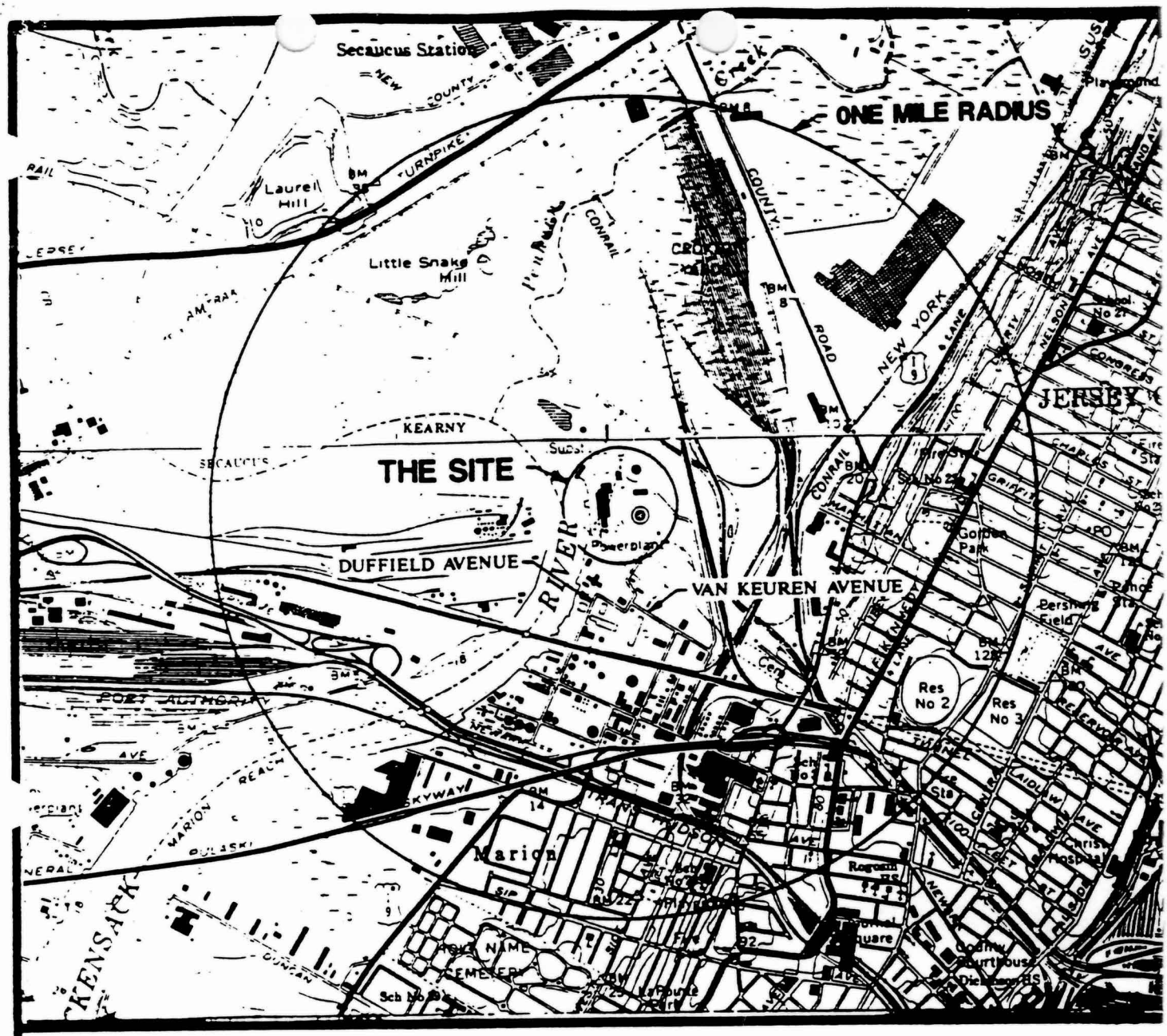
I certify under penalty of law that the information provided in this document is, to the best of my knowledge, true, accurate and complete. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information,

John J. Donleavy
Manager
Hudson Generating Station

Sworn and subscribed before me
this 13th day of February 1997.

JAMES H. PEACH
NOTARY PUBLIC OF NEW JERSEY
I.D. # 2164620
MY COMMISSION EXPIRES APRIL 19, 1999

ATTACHMENT "A"



SCALE 1:24 000

NEW JERSEY

QUADRANGLE LOCATION

1 0 1
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL

N

COORDINATES
UTM: 4,511,000mN, 578,200mE
LONGITUDE : 74° 04' 25" W
LATITUDE : 40° 44' 50" N

ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.
A	PRELIMINARY	M.C.	J.R.S.	J.R.S.

BASE MAP: UNITED STATES GEOLOGICAL SURVEY (USGS) JERSEY CITY, N.J. – N.Y. QUADRANGLE

CleanHarbors
ENVIRONMENTAL ENGINEERING, INC.
325 Wood Road
Braintree, Massachusetts 02184
Telephone (617) 849-1200/1800

PUBLIC SERVICE ELECTRIC & GAS COMP/
HUDSON GENERATING STATION
DUFFIELD AND VAN KEUREN AVENUES
JERSEY CITY, NEW JERSEY 07306

LOCUS MAP

PROJECT NO.	DWG. NO.	FIGURE
E-2599	2599-L-04	
SCALE AS NOTED		

ATTACHMENT "B"

PSEG Public Service Electric and Gas Company

80 Park Plaza, T-4B, Newark, NJ 07101 / (201) 430-5630 FAX: (201) 242 6843

Robert C. Murray Senior Vice President - Finance and Chief Financial Officer

LETTER FROM CHIEF FINANCIAL OFFICER

I am the chief financial officer of Public Service Electric and Gas Company. This letter is in support of the use of "the financial test of self-insurance" to demonstrate financial responsibility for taking corrective action caused by discharges in the amount of at least One Million Dollars per occurrence and Two Million Dollars annual aggregate.

A "financial test" is also used by this "owner or operator" to demonstrate evidence of financial responsibility in the following amount under the following EPA or State rules or regulations (i.e. RCRA, ECRA, UST, etc.):

N/A

This "owner or operator" has not received an adverse opinion, a disclaimer of opinion, or a "going concern" qualification from an independent auditor or his or her financial statements for the latest completed fiscal year.

ALTERNATIVE I

1.	Amount of annual DCR aggregate coverage being assured by a financial test and/or guarantee (2,000,000 x 10 sites)	$ 20,000,000
2.	Amount of annual aggregate coverage for all other federal or State regulatory costs (i.e. RCRA, ECRA, UST, etc.) covered by a financial test, and/or guarantee	$ N/A
3.	Sum of lines 1 and 2	$ 20,000,000
4.	Total tangible assets	$ 15,861,484,000
5.	Total liabilities	$ 9,251,882,000
6.	Tangible net worth	$ 6,609,602,000

		Yes	No
7.	Is line 6 at least $10 million?	X	___
8.	Is line 6 at least 10 times line 3?	X	___
9.	Have financial statements for the latest fiscal year been filed with the Securities Exchange Commission?	X	___
10.	Have financial statements for the latest fiscal year been filed with the Energy Information Administration?	___	X
11.	Have financial statements for the latest fiscal year been filed with the Rural Electrification Administration?	___	X
12.	Has financial information been provided to Dun and Bradstreet, and has Dun and Bradstreet provided a financial strength rating of 4A or 7A?	___	X

I hereby certify that the wording of this letter is identical to the wording specified in Appendix B of N.J.A.C. 7:1.E, as such rules were constituted on the date shown immediately below.

Robert C. Murray
Senior Vice President and
Chief Financial Officer

Date: 7/13/94

WESTON • SPER
Region II
300 McGaw Drive - 2nd Floor, Raritan Center
Edison, NJ 08837 • (201) 225-6116

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-6669

TAT-02-F-01622 MEMORANDUM

TO: Tom Kady
Response and Prevention Branch, U.S. EPA

FROM: Anne Tischbein
TAT/II

SUBJECT: SPCC Field Inspection
Public Service Electric & Gas
Roseland Switching Station
25 Eisenhower Parkway
Roseland, New Jersey 07068

DATE: May 23, 1985

In accordance with TDD #2-8501-28M, an inspection was conducted at the Public Service Electric and Gas (PSE&G), Roseland Switching Station in Roseland, New Jersey on May 15, 1985.

On June 30, 1984, a small spill occurred at this facility. In following up this spill, New Jersey Department of Environmental Protection (NJDEP) representatives advised PSE&G that they were in violation of federal Spill Prevention Control and Countermeasure (SPCC) regulations. PSE&G revised their SPCC plan and implemented these revisions. A copy of this revised SPCC plan was received by EPA on April 4, 1985.

NJDEP was notified that the PSE&G Roseland Switching Station was to be inspected by EPA, however, an NJDEP representative did not participate in the inspection. Tom McKee, NJDEP, contacted TAT member Anne Tischbein and requested to be copied on all correspondence concerning this issue.

Observations

A review of the SPCC Plan and the field inspection revealed the following shortcomings as related to the guidelines established in the applicable section of 40 CFR 112.

1) 40 CFR 112.3(d) - The SPCC plan was not certified by a professional engineer.

2) 40 CFR 112.7(b) - The volume and number of transformers/capacitors at the site were not listed in the plan.

3) 40 CFR 112.7(c) - The facility has adequate secondary containment for the five 20,000 gallon storage tanks, however, there is no secondary containment provided for the numerous oil filled transformers which, according to EPA guidance policy, are also to be considered as part of the facility's overall storage capacity.

4) 40 CFR 112.7(e)(2) - A discussion of the high/low level alarms recently installed at the facility is not provided in the plan.

5) 40 CFR 112.7(e)(4) - There is no secondary containment in truck loading/unloading area.

6) 40 CFR 112.7(e)(9) - The discharge valves to the five 20,000 gallon storage tanks at the unmanned facility are not locked.

Discussion:

The previously cited observations were discussed with Eric Svenson, PSE&G representative, during the facility inspection. PSE&G agreed to discuss the following points in their revised SPCC plan.

1) They will list the number of transformers/capacitors.

2) They will discuss their high level/low level alarm system on the five 20,000 gallon tanks.

3) They will discuss their spill prevention procedures in the truck loading/unloading area that they currently use. (They stated they receive only 2-3 truck loads of oil per year).

4) They agreed to lock all discharge valves on the five 20,000 gallon storage tanks and discuss this.

PSE&G ensured that they will have the revised plan certified by a professional engineer.

The facility tour identified several points of concern. The PSE&G Roseland Switching Station is located on the banks of the Passaic River. This river is prone to flooding. The lowest area of transformers may be susceptible to flooding. There is not secondary containment to prevent oil from a transformer leak from reaching the river. The facility does have a tile drain system that encircles the facility and discharges to the oil/water separator.

The attitude of the PSE&G representatives was extremely cooperative.

11/26/86

RESPONSE & PREVENTION BRANCH

INCIDENT RESPONSE FORM

(Attach to Incident Notification sheet)

EPA Case No.: 815-87 LOCATION ROSELAND STATE N.J.

Response Date: 6/16/87 Arrival Time: 0730 Depart. Time 0830

Investigators: R CAPITANO

Signature: Peter J Capitano Date: 6/16/87

Officials on Scene: (address, telephone)

Responsible Party PSE+G SWITCHING STATION

Municipality ROSELAND

State N. J.

Situation: AN OIL FILLED (31,390 GALLONS) TRANSFORMER (NON-PCB OIL) EXPLODED DUE TO EXCESSIVE HEAT BUILD-UP. MORE THAN 20,000 GALLONS WAS RELEASED TO THE GRAVEL COVERED FACILITY A SMALL AMOUNT FOUND ITS WAY TO THE PASSAIC RIVER.

Action: ACTION: COLLECTION PITS AND TRENCHES WERE MADE TO COLLECT OIL BEFORE IT REACHED THE RIVER. A BOOM IS TO BE PLACED AT POINTS OF ENTRY AND ACROSS THE RIVER TO CONTAIN OIL FROM MIGRATING

Follow-up: EPA WILL MONITOR CLEAN-UP

REGIO[illegible]2 INCIDENT NOTIFICATION R[illegible]PORT

(1)

State Case No. _____ 1. EPA Case No. 815-87

2. Reported: (mm/dd/yy) 6/15/87	3. Time: 2230	Recorded By: PJC
4. Through NRC: ☐ Yes ☐ No	5. NRC Case No.:	

A. REPORTER

6. Reported By: MR. GALGANO
7. Organization Name: PSE&G
8. Organization: ☒ 9. responsible party ☐ 10. public ☐ 11. state ☐ 12. local ☐ 13. federal
14. Address: EISENHOWER PKWY.
15. City: ROSELAND | 16. State: N.J. | 17. Zip:
18. Phone: (201) 365 2902

B. DISCHARGER

19. Responsible Party:
20. Address: SAME AS (A)
21. City: | 22. State: | 23. Zip:
24. Phone: ( )

C. INCIDENT LOCATION

☒ 25. As Above in B | 26. Street or Approx. Location: EISENHOWER PKWY SWITCHING STATION
27. City: ROSELAND | 28. County: ESSEX | 29. State: N.J.

D. DATE

30. Spill Date: (mm/dd/yy) 6-15-87 | 31. Spill Time: 2030

E. MATERIAL

Material: ☐ Oil ☐ Haz Sub ☐ CEPP	UN/ DOT No	CAS No.	CHRIS Code	Quantity Spilled	Units (Circle 1)	>RQ
32. MORE THAN	33.	34.	35.	36. UNK	lb. gal. 37. bbl. oth	
38. 10,000 GALLONS	39.	40.	41.	42.	lb. gal. 43. bbl. oth	
44. NON-PCB TRANSFORMER	45.	46.	47.	48.	lb. gal. 49. bbl. oth	

F. SOURCE

Source of Spill: ☐ 50. highway ☐ 51. air ☐ 52. railway ☐ 53. vessel ☒ 54. fixed facility ☐ 55. pipeline ☐ 56. offshore
57. Vehicle ID or Carrier No.:
58. Description: TRANSFORMERS OVER HEATED AND EXPLODED

G. MED.

Medium Affected: ☐ 59. air ☒ 60. land ☒ 61. water ☐ 62. groundwater
63. Waterway Affected ~~NEAR~~ PASSAIC RIVER

H. CAUSE

Reported Cause: ☐ 64. transportation accident ☒ 65. equipment failure ☐ 66. operational error ☐ 67. natural phenomenon ☐ 68. dumping ☐ 69. unknown ☐ 70. other
71. Description: OVERHEATED POWER TRANSFORMER EXPLODED

I. DAM

Damages: 72. no. of injuries _____ 73. no of deaths _____ 74. property damage > $50,000 ☐ yes ☐ no

J. ACTIONS

☐ 75. Evacuation | 76. Response Action Taken: IN HOUSE CREWS WAS CONTAINED THE SPILL & CLEANING IT UP

K. NOTIFIED

Caller Has Notified: ☒ 77a. state ☐ 77b. local ☐ 78. responsible party ☐ 79. USCG ☐ 80. other ☐ 81. unknown ☐ EPA ☒ NRC
Agency Name _____

L. COMMENTS

82. Comments: S.J.W CONTRACTORS COMING TO PICK UP WASTE.
☐ Additional Information

M. REGIONAL DATA FIELDS

Responsibility: ☒ EPA ☐ USCG ☐ other
Response By: ☐ responsible party ☐ state ☐ local ☒ EPA ☐ USCG ☐ other
Agency Name: U.S. EPA EMERGENCY RESPONSE BRANCH
EPA Has Notified: ☐ State ☐ USCG ☐ RRT ☐ EPA Referral

☐ POLREP	☐ SPCC Letter	☐ CWA 308 Spill Letter	TDD No.:
Regional Cause Code(s):		Prevention Code(s):	

RESPONSE

PSEG Power LLC
751 Cliff Road, Sewaren, New Jersey 07077-1435

PSEG Power LLC

February 12, 2002

VIA EXPRESS MAIL ET254056343US

Regional Administrator – Region II
United States Environmental Protection Agency
290 Broadway
New York, New York 10007

Re: Sixty-Day Written Report
PSEG Fossil LLC
Linden Generating Station
Case No. 588784

Dear Sir or Madam:

In accordance with 40 C.F.R. § 112.4, PSEG Fossil LLC ("PSEG Fossil") is submitting the attached report with respect to a discharge of synthetic dielectric fluid from an underground oil static cable that occurred on December 15, 2002. The incident was reported to the National Response Center and assigned Case No. 588784

If you have any questions or need additional information, please contact Mr. Willie O. Washington, Senior Environmental Engineer, at (973) 430-8789.

Very truly yours,

Andres F. Gomez
Manager - Linden Generating Station

Attachments

cc: USEPA – Region 2
Attn: Response and Prevention Branch (w/attach) (via certified mail)

NJDEP
Bureau of Discharge Prevention
Attn: Discharge Confirmation Report (w/attach) (via certified mail)

bcc: R. Felton
C. McAuliffe
W. Washington
M. Silvestri
T. Syed
M. Zielenski

SIXTY_DAY WRITTEN REPORT

1. Name of Facility:

PSEG Fossil LLC
Linden Generating Station

2. Owner or Operator of the Facility:

Owner:

PSEG Fossil LLC
80 Park Plaza, T-16E
Newark, New Jersey 07101
(973) 430-7000

Operator:

PSEG Fossil LLC
Linden Generating Station
4001 Wood Avenue South
Linden, New Jersey 07036
Attn: Andres Gomez – Station Manager

3. Location of the Facility:

PSEG Fossil LLC
Linden Generating Station
Grasselli Area
4001 Wood Avenue South
Linden, NJ 07036

4. Date and Year of Initial Facility Operation:

The Station commenced operations in May 1957.

5. Maximum Storage or Handling Capacity of the Facility and Normal Daily Throughput:

The discharge was caused by a failure in the underground oil static pipe-type cable – Circuit E395 owned by Public Service Electric and Gas Company ("PSE&G").Based on discussions with PSE&G personnel, the pipe-type cable system is a heat exchange system and does not function as a throughput system. At the time that the discharge occurred, there was approximately 5, 400 gallons of oil in the pipe-type cable at issue.

6. **Description of the Facility, including maps, flow diagrams, and topographical maps**

Linden is a fossil-fueled electric generating facility. The Station consists of two electric steam generating units and five combustion turbine units. The pipe-type cable runs from the Station to the Tosco oil refinery, it is an electric sub-transmission line that provides an electric feed to the refinery. Linden occupies approximately 101.633 acres of land. A locus map shows the site location and is attached hereto. A topographical map is included in the Discharge Prevention Containment and Countermeasure Plan and Discharge Cleanup and Removal Plan and Spill Prevention Control and Countermeasure Plan ("Plan") and is available upon request.

7. **A Complete copy of the SPCC Plan with any Amendments:** A copy of the Plan is available upon request.

8. **The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred.**

The discharge was caused by a failure in the underground oil static pipe-type cable – Circuit E395 owned by Public Service Electric and Gas Company ("PSE&G").

9. **The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements.**

Based on discussions with PSE&G personnel, annunciator alarms indicating a low pressure condition in the pipe-type cable system activated on December 14, 2001 at approximately 2300 hours. The cable is buried and is approximately 4600 feet in length requiring visual inspection to determine if there had been a discharge. Investigations of the alarms and pipe-type cable indicated that a possible leak in the system had occurred. The line was consequently depressurized to zero pressure and the valve located at the pump house was closed to minimize the amount of oil that might be discharged.

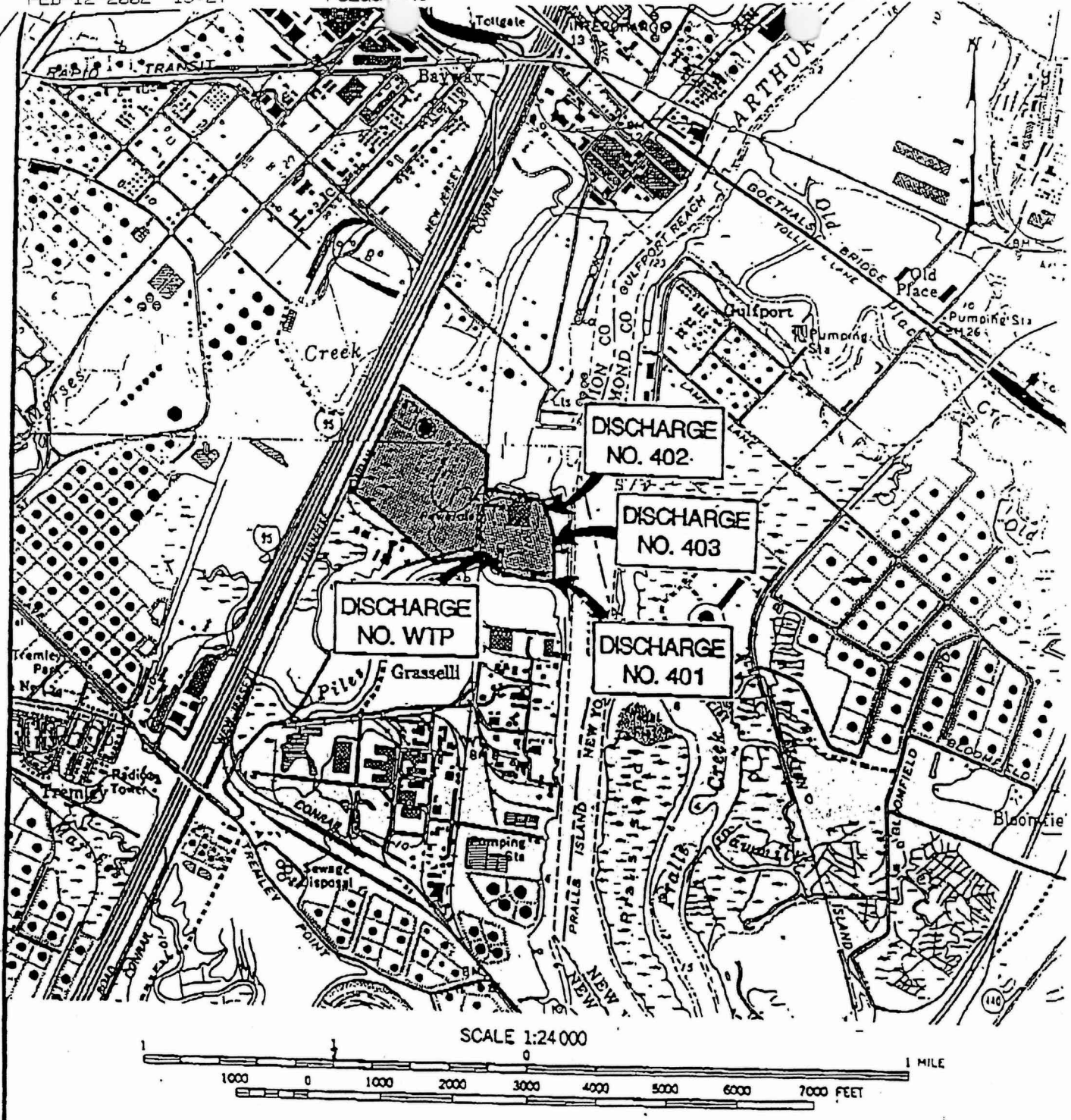
The area surrounding the pipe-type cable was excavated to determine the exact location of the discharge. A sleeve was welded around the break in the pipe and the line was subsequently drained of oil to the greatest extent possible. Clean Harbors Environmental Services, Inc. was called and provided absorbent material, which was deployed in the impacted area to absorb the dielectric fluid. Containment booms were utilized to prevent the fluid from leaving the impacted area. Clean Harbors also provided vacuum tank trucks, which were utilized to recover as much product as possible. Kemsco Construction and Equipment Co. Inc. was retained to excavate and expose the pipe-type cable and remove contaminated soil from the impacted area. Cleanup activities are still in progress.

10. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.

Based on discussions with PSE&G personnel, when the location of the discharge was found, a sleeve was welded around the break in the pipe and the line was subsequently drained of oil to the greatest extent possible. This pipe-type cable has been removed from service. PSE&G plans to decommission this line and any remaining product contained within the pipe will be removed.

11. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

Will be made available upon request.



SOURCE:
U.S.G.S. TOPOGRAPHIC MAP
7.5. MINUTE SERIES QUAD
ARTHUR KILL, N.Y.-N.J.
1966, PHOTOREVISED 1981
ELIZABETH, N.J.-N.Y.
1967, PHOTOREVISED 1981

USGS SITE LOCATION MAP
LINDEN GENERATING STATION
CITY OF LINDEN
UNION COUNTY, NEW JERSEY

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
80 PARK PLAZA
NEWARK, NEW JERSEY 07101

Drn. By: M.R.	Scale: as shown	Proj. No.
Ck'd By: C.W.V.	Date: 11/6/90	Fig. No. 1